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REMARKS .

Claims 1-91 are currently pending in the subject application and are presently under consideration. Claims 1, 3, 11, 18, 29, 39, 44, 47-49, and 53-91 have been amended herein. A marked-up of all pending claims is found at pages 2-23 of this Reply.

In a telephonic interview on August 13, 2003, applicants' representative spoke with the Examiner regarding an informality in the claims of the subject application. Specifically, the present application was submitted with two (2) claims designated as "52." The Examiner stated that the claims had been renumbered for purposes of examination. Therefore, the claims are herein renumbered to reflect the correct numbering of claims 1-91.

Applicants' representative notes with appreciation the Examiner's indication that claims 17, 24-28, 30, 31, 33, 34, 36, 38, 51, 52, 58, 65, 66, 69, 71, 72, 74, 76, and 87 would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. Applicants' representative reserves the right to do so at a later date if necessary. However, applicants' representative respectfully points out that independent claim 51 is included by the Examiner as allowable subject matter. In the telephonic interview mentioned above, the Examiner verified that independent claim 51, and claim 52 (which depends there from) are allowed.

Favorable reconsideration of the subject patent application is respectfully requested in view of the comments and amendments herein.

I.   <u>Rejection of Claims 1-5, 7-9, 18-21, 28-29, 37, 44-46, 48-50, 59-62, 67, 75,
       82-84, 86, and 90 Under 35 U.S.C. §102(e)</u>

Claims 1-5, 7-9, 18-21, 28-29, 37, 44-46, 48-50, 59-62, 67, 75, 82-84, 86, and 90 stand rejected under 35 U.S.C. §102(e) as being anticipated by Beckett *et al.* (U.S. 6,564,368). This rejection should be withdrawn for at least the following reasons. Becket *et al.* does not disclose each and every element as set forth in the subject claims.

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> "A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ 2d 1051, 1053 (Fed. Cir. 1987). "The identical invention must be shown in as complete detail as is contained in the...claim." Richardson v. Suzuki Motor Co., 868 F.2d 1226, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989).

The present invention relates to mapping a source object with a target object, and more specifically to a graphical user interface and methods for defining a mapping between a source object and a target object in a mapping tool. Amended independent claim 1 recites "...a *mapping screen region, separate from and adjacent to each of the source screen region and the target screen region,* and adapted to allow a user to create a mapping between the graphical representation of the source object and the graphical representation of the target object *using graphical mapping indicia*." Independent claims 3, 18, 29, 44, 48, 49, 59, 67, 82, 85, and 86 recite similar aspects. Figures 1, 3A, and 3B, clearly illustrate that the mapping screen region is separate from and adjacent to both the source screen region and the target screen region. The independent claims of the present application have been amended to clarify this aspect of the invention. Additionally, "*The graphical mapping indicia* [collectively] *16 comprises links 16a and function objects or functoids 16b in the mapping screen region 12...*" (Page 13, lines 27-28.) Beckett *et al.* does not disclose such aspects as set forth in the subject claims.

The Examiner asserts that Beckett *et al.* describes "a mapping screen region, wherein the mapping screen region is the Connection Editor in general..." However, if Beckett *et al.* is read in such a manner, then the source region and the target region of Beckett *et al.* are wholly contained by the mapping region. The mapping region of the present invention comprises a screen area that is separate and distinct from both the source screen region and the target screen region. Such aspect of the present invention is clearly described in both the text and the figures of the application (*See, e.g.,* page 14, lines 28-30. *See also* Figure 3A.) However, the independent claims of the of the subject application have been amended herein to more clearly point out the orientation of the screen regions with respect to each other. Beckett *et al.* fails to describe a mapping

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screen region positioned adjacent to and separate from both a source screen region and a target screen region.

The Examiner further contends that the lines shown by Figure 5D of Beckett *et al.* represent a connection between a source object node and a target object node, and, thus, "...the application development environment user interface described by Beckett is also understood to comprise a mapping screen region, wherein this mapping screen region is the Connection Editor in general, and wherein this mapping screen region is adapted to allow a user to create a mapping between the source program tree and the target program tree using graphical mapping indicia with a graphical link indicia adapted to associate the target node with the source node." However, the lines of Figure 5D are not "function *objects* or functoids 16b" as set forth in the detailed description of the "graphical mapping indicia 16" claimed in the subject independent claims. The subject application clearly delineates the differences between *graphical mapping indicia 16* and "*connection indicia 18b* in the regions 4 and/or 8 graphically indicating that a node in the source and/or target objects 6 and/or 10 is connected or linked to another entity *via* the mapping 14." (Page 14, lines 2-5.) While the connection indicia 18b can be a line such as described by Beckett *et al.* in Figure 5D, such a line is not a graphical mapping indicium as set forth by the subject claims and as described by the present application.

In view of the above, it is respectfully submitted that Beckett *et al.* does not anticipate or make obvious claims 1, 3, 18, 29, 44, 48, 49, 59, 67, 82, 85, and 86 (and claims 2, 4-5, 7-9, 19-21, 28, 37, 45-46, 50, 60-62, 75, 83-84, and 90, which depend respectively there from). Therefore, this rejection should be withdrawn.

II.   **Rejection of Claims 6, 39-43, 77-81, and 89 Under 35 U.S.C. § 103(a)**

Claims 6, 39-43, 77-81, and 89 stand rejected under 35 U.S.C. §103(a) as being unpatentable over the Beckett *et al.* (U.S. 6,564,368) in view of Adobe Acrobat Reader, Figure A (hereinafter "Adobe"). This rejection should be withdrawn for at least the following reasons. Neither Beckett *et al.* nor Adobe, alone or in combination, teach or suggest each and every limitation of the claimed invention.

To reject claims in an application under §103, an examiner must establish a *prima facie* case of obviousness. A *prima facie* case of obviousness is established by a showing of three basic criteria. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. *See* MPEP §706.02(j). The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art and not based on applicant's disclosure. *See In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991).

As stated above, independent claims 3 recites "…a *mapping screen region, separate from and adjacent to each of the source screen region and the target screen region*, and adapted to allow a user to create a mapping between the graphical representation of the source object and the graphical representation of the target object *using graphical mapping indicia*." Independent claims 39, 77, and 86 recite similar aspects. In view of the above comments, it is readily apparent that Beckett *et al.* does not teach or suggest such elements of the present invention.

Adobe fails to overcome the deficiencies of Beckett *et al.* with respect to independent claims 3, 39, 77, and 86. Specifically, Adobe does not teach or suggest *a mapping screen region that is separate from and adjacent to* each of a source screen region and a target screen region, or utilizing *graphical mapping indicia*. As discussed above, a graphical mapping indicium 16b is distinguished from a connection indicium 18b, such as a line, by the subject application. Neither Beckett *et al.* nor Adobe, alone or in combination, teach or suggest such aspects of the present invention. Accordingly, this rejection should be withdrawn.

III.   **Rejection of Claims 10, 22-23, 32, 35, 47, 63-64, 70, 73, 85, and 91 Under 35 U.S.C. § 103(a)**

Claims 10, 22-23, 32, 35, 47, 63-64, 70, 73, 85, and 91 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Beckett *et al.* (U.S. 6,564,368) in view of Liu *et al.* (U.S.

6,216,131). This rejection should be withdrawn for at least the following reasons. Neither Beckett *et al.* nor Liu *et al.*, alone or in combination, teach or suggest every limitation set forth in the subject claims.

As discussed above with reference to Beckett *et al.*, independent claims 3, 18, 29, 44, 59, 69, and 86 recite "...a *mapping screen region, separate from and adjacent to each of the source screen region and the target screen region*, and adapted to allow a user to create a mapping between the graphical representation of the source object and the graphical representation of the target object *using graphical mapping indicia*." Independent claims 18, 29, 44, 59, 69, 85, and 86 recite aspects similar to the above. Liu *et al.* fails to overcome the deficiencies of Beckett *et al.* with respect to such aspects of the claimed invention. Therefore, this rejection should be withdrawn.

IV.   **Rejection of Claims 11-13, 15-16, 30, 53-54, 56-57, 68, and 88 Under 35 U.S.C. §
       103(a)**

Claims 11-13, 15-16, 30, 53-54, 56-57, 68, and 88 are rejected under 35 U.S.C. 103(a) as being unpatentable over Beckett *et al.* (U.S. 6,564,368) in view of Delphi 3, as described by Neil Rubenking in the book entitled *Delphi 3 for Dummies*. This rejection should be withdrawn for at least the following reasons. Claims 11-13, 15-16, 30, 54, 56-57, 68, and 88 depend respectively from independent claims 3, 11, 29, 53, 67, and 86.

In view of the comments above, it is readily apparent that Beckett *et al.* does not teach or suggest each and every element of the present invention as set forth in the subject claims. Delphi 3 fails to make up for the deficiencies of Beckett *et al.* with regard to independent claims 3, 11, 29, 53, 67, and 86. Specifically, Delphi 3 does not teach or suggest a mapping screen region located separate from and adjacent to each of a source screen region and a target screen region. Nor does Delphi 3 teach or suggest graphical mapping indicia as presently claimed.

Therefore, it is respectfully submitted that this rejection should be withdrawn.

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CONCLUSION

The present application is believed to be in condition for allowance in view of the above comments and amendments. A prompt action to such end is earnestly solicited.

In the event any fees are due in connection with this document, the Commissioner is authorized to charge those fees to Deposit Account No. 50-1063.

Should the Examiner believe a telephone interview would be helpful to expedite favorable prosecution, the Examiner is invited to contact applicants' undersigned representative at the telephone number listed below.

Respectfully submitted,

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